

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 3:12CR021
Plaintiff,	:	JUDGE THOMAS M. ROSE
v.	:	
GEORGE J. DAOUD,	:	
Defendant.	:	

UNITED STATES' MOTION FOR FORFEITURE MONEY JUDGMENT

The United States of America, by its undersigned counsel, respectfully submits its Motion for a Forfeiture Money Judgment in the amount of \$131,000.00 in the above-entitled case for the reasons set forth in the following memorandum. A proposed order is submitted with this motion.

Memorandum

1. On February 15, 2012, a 92 Count Indictment was returned against Defendant, GEORGE J. DAOUD, hereinafter "Defendant" and other defendants not referenced herein. Count 1 charged the Defendant with Conspiracy to Engage in Money Laundering, in violation of 18 U.S.C. § 1956(h). Counts 2-45 charged the Defendant with Fraud by Wire. Counts 46-91 charged the Defendant with Unauthorized Use, Transfer, Acquisition and Possession of U.S. Department of Agriculture Supplemental Nutrition Assistance Program (Food Stamp) Benefits, in violation of 7 U.S.C. § 2024(b). Count 92 charged the Defendant with Theft of Public Monies, in violation of 18 U.S.C. § 641. The Indictment sought forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), 7 U.S.C. § 2024(e) and 7 U.S.C. § 2024(f). (Doc. 5.)

2. On October 16, 2012, the Defendant entered into a Plea Agreement with the United States, and plead guilty to: Count 1, Conspiracy to Engage in Money Laundering, in violation of 18 U.S.C. § 1956(h); Count 46, Unauthorized Use, Transfer, Acquisition and Possession of U.S. Department of Agriculture Supplemental Nutrition Assistance Program (Food Stamp) Benefits, in violation of 7 U.S.C. § 2024(b); and Count 92, Theft of Public Monies, in violation of 18 U.S.C. § 641. (Doc. 56.)

3. In pleading guilty to Counts 1, 46 & 92, the Defendant agreed to the immediate forfeiture, pursuant to 18 U.S.C. § 982(a)(1), 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), 7 U.S.C. §§ 2024(e) and (f) of the following specific property:

(a) Account Contents of PNC Bank, Acct#*****0482, in the Name of Geolam Inc. DBA: Main Express Food Mart, in the Amount of \$10,223.38;

(b) Account Contents of PNC Bank, Acct#*****0212, in the Name of Geolam Inc. DBA: Main Express Food Mart, Manager Acct, in the Amount of \$1,622.55;

(c) Account Contents of PNC Bank, Acct#*****0204, in the Name of Geolam Inc. DBA: Main Express Food Mart, in the Amount of \$1,316.91;

(d) Account Contents of PNC Bank, Acct#*****2997, in the Name of Lama Daoud, in the Amount of \$1,268.44;

(e) \$2,661.00 U.S. Currency;

(f) \$207.00 U.S. Currency;

(g) \$182.00 U.S. Currency;

(h) 2002 Lexus LX470, VIN: JTJHT00W523513550; and

(i) Miscellaneous Jewelry.

4. In accordance with the terms of the Plea Agreement, the above listed specific property was forfeited in the related civil case (U.S. v. Acct. Contents PNC Bank #0482, et al., Case No. 3:12CV231-TMR, Docs. 23 & 27).

5. In addition to the forfeiture of the specific property, the Defendant agreed to pay a forfeiture money judgment in the amount of \$125,000.00 which represents a forfeiture money judgment pursuant to 18 U.S.C. § 982(a)(1) relevant to the offense in Count 1 (Plea Agreement, Doc. 56, Paragraph 22) and an additional forfeiture money judgment in the amount of \$6,000.00 (Joint Sentencing Stipulation, Doc. 70).

6. On December 18, 2013, this Court issued an Amended Judgment (Doc. 88) ordering the Defendant to a forfeiture money judgment in the total amount of \$131,000.00 per Notice of Joint Sentencing Stipulation (Doc. 70).

7. The Defendant has paid \$131,500.00 towards the forfeiture money judgment.

8. The entry of the attached Forfeiture of Money Judgment authorizes the custodian of the property to seize and dispose of the payment made by the Defendant in the total amount of \$131,000.00 (hereinafter referred to as the "Subject Property"). The amount of \$500.00 shall be returned to the Defendant through his attorney of record.

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9. Accordingly, the United States respectfully requests that this Court enter the Forfeiture Money Judgment in the amount of \$131,000.00 as proposed in the attached order.

Respectfully submitted,

CARTER M. STEWART
United States Attorney

s/Dwight K. Keller

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2014, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record registered with the CM/ECF system.

s/Dwight K. Keller

DWIGHT K. KELLER (0074533)
Assistant United States Attorney